

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**PACSEC3, LLC,
Plaintiff,**

v.

**AXWAY, INC.,
Defendant**

Civil Action No. 1:24-cv-04711-MLB

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
RESPOND TO COMPLAINT**

Plaintiff, PacSec3, LLC (“PacSec3” or “Plaintiff”) files this Unopposed Motion for Extension of Time for Defendant, Axway, Inc., (“Axway” or “Defendant”) to Answer or Respond to Complaint and respectfully shows the following:

Plaintiff filed its Complaint on October 16, 2024 (Dkt. No. 1) and served Defendant on November 1, 2024. Defendant’s response is due November 22, 2024. Defendant has requested a 60-day extension to respond on or before January 21, 2025, and more needs time to prepare to defend the matter and/or explore early resolution opportunities. Plaintiff does not oppose this request.

Wherefore, Plaintiff respectfully requests that the Court grant this motion and enter an order extending the deadline for Defendant to answer or otherwise respond to the Complaint to January 21, 2025.

Respectfully Submitted

Respectfully submitted,

THE DUCOS LAW FIRM, LLC

Alexander Shunnarah Trial Attorneys, of Counsel

/s/ Kristina Ducos

Kristina Ducos

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&

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Attorney for PacSec3, LLC

CERTIFICATE OF CONFERENCE

Pursuant to Local Rules, counsel for Plaintiff, conferred with counsel for defendant on November 20, 2024. Plaintiff is unopposed to the extension.

/s/ William P. Ramey, III

William P. Ramey, III

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this day of November 26, 2024, with a copy of the foregoing via CM/ECF Filing.

/s/ William P. Ramey, III
William P. Ramey, III